



February 22, 2012  
Via ECFS Filing

Ms. Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Suite TW-A325  
Washington, DC 20554

**RE: ooma, Inc. – 499 Filer ID 826871**  
**CY 2011 Annual CPNI Certification**  
**EB Docket No. 06-36**

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2011 CPNI Compliance Certification and Statement of CPNI Procedures and Compliance as required by 47 C.F.R. Section 64.2009 (e) submitted on behalf of ooma, Inc.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3004 or via email to [rnorton@tmnc.com](mailto:rnorton@tmnc.com). Thank you for your assistance in this matter.

Sincerely,

/s/ Robin Norton

Robin Norton  
Consultant to ooma, Inc.

cc: John Summers - ooma  
file: ooma - FCC - CPNI  
tms: FCx1201

Enclosures  
RN/sp

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

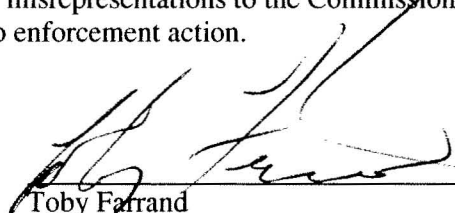
**EB DOCKET 06-36**

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Annual 64.2009(e) CPNI Certification for:	Covering Calendar Year 2011
<b>Name of Company covered by this certification:</b>	<b>ooma, Inc.</b>
Form 499 Filer ID:	826871
Name of Signatory:	Toby Farrand
Title of Signatory:	V.P. Engineering and Operations

I, Toby Farrand, certify and state that:

1. I am V.P. of Engineering and Operations of ooma, Inc. and, acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*
2. Attached to this certification, as Exhibit A, is an accompanying statement explaining how the Company's procedures ensure that the Company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in Section 64.2001 *et seq.* of the Commission's rules.
3. The Company has not taken any actions (i.e., proceedings instituted or petitions filed by the Company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.
4. The Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.
5. The Company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The Company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

  
\_\_\_\_\_  
Toby Farrand  
V.P. Engineering and Operations

2/21/12  
\_\_\_\_\_  
Date

Exhibit A  
Statement of CPNI Procedures and Compliance

**ooma, Inc.**

Calendar Year 2011

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

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ooma, Inc.

**STATEMENT OF CPNI PROCEDURES AND COMPLIANCE (2011)**

ooma, Inc. ("ooma" or "Company") provides local exchange and long distance services via Voice over Internet Protocol (VoIP) on a prepaid basis to residential and small business customers. The Company does not use or permit access to CPNI to market any services outside of the total service approach as specified in 47 CFR §64.2005. If ooma elects to use CPNI in a manner that does require customer approval, it will follow the applicable rules set forth in 47 CFR Subpart U, including the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

ooma has taken steps to secure CPNI and call detail records, and to manage the release of such information in accordance with FCC rules. The Company has put into place processes to safeguard customer CPNI and call detail information from improper use or disclosure by employees, and to discover and protect against attempts by third parties to gain unauthorized access to CPNI.

The Company requires customers to create their own password, and respond to a security question, at the initiation of service. Passwords are not issued by the Company and can only be reset by sending the new password to the customer via the email account on record. The secret question/answer is required as a back-up method for authenticating a customer's identity.

The Company provides call detail information over the telephone only once the ANI number the customer is calling from matches one of the telephone numbers on the account. If there is not a match, general account information will be given upon successful account address verification. In the event an account change/modification is requested, (and if there is no ANI match) the secret question response is required. Access to call detail information is also available on-line through password and secret question response. The Company can reset the password in the event the customer has forgotten or lost it. A new password is sent to the customer's email account of record.

STATEMENT OF CPNI PROCEDURES AND COMPLIANCE (2011)  
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The Company notifies customers via a previously established email address or by mail to the customer address of record, all notifications regarding account changes (without revealing the changed information or sending the notification to the new account information), password changes, change in a response to a back-up means of authentication, change to an on-line account, change or creation of an address of record other than at service initiation.

The Company maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI.

The Company does not have retail locations and, therefore, does not disclose CPNI in-store. Retail sales of ooma product(s) are available through “brick and mortar” retail establishments as well as on-line shopping websites. ooma does not own or control any of the retail establishments or websites (other than its own). No employee of such retail locations has access to any customer account information. Customers are required to connect to ooma service through the Company’s website or via telephone. This allows the Company to establish the safeguards needed to protect CPNI and call detail records for service initiation.

The Company has procedures in place to notify law enforcement (United States Secret Service and FBI) of a breach of a customer’s CPNI within seven (7) business days, and to notify customers of the breach. The Company will maintain a record of any breaches discovered and notifications made to the USSS and FBI. The customer’s electronic record will be updated with information regarding notifications on CPNI breaches.

The Company has not taken any actions against data brokers in the last year.

The Company has not received any complaints about unauthorized release or disclosure of CPNI for the last calendar year.

The Company has not developed any information with respect to the processes that pretexters are using to attempt to access CPNI.